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*A GCC REPRESENTATIVE OFFICE
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ALLIANCES IN MEXICO
AND SRI LANKA

December 31, 2020

VIA EMAIL

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Re: **In re Valsartan, Losartan, and Irbesartan Products Liability Litigation**
Civ. No. 19-2875 (D.N.J.)

Counsel:

Pursuant to the Court's December 23, 2019 (Doc. 328), April 20, 2020 (Doc. 416), and June 23, 2020 (Doc. 487) Orders and June 3, 2020 instruction in the above-referenced matter, and subject to the Discovery Confidentiality Order (Doc. 139, the "DCO"), defendant Zhejiang Huahai Pharmaceutical Co., Ltd ("ZHP") is producing documents through the Aquipt document repository as production volume ZHP028 (ZHP02666949 – ZHP02671217). These documents are from the custodial files of Xavier Tang, a document custodian added by agreement of the Parties.

This production of documents is made subject to the objections made by counsel during the December 11, 2019 conference with Judge Schneider. ZHP reserves any and all objections as to relevance, materiality, privilege, admissibility, or any other grounds on which an objection may be made.

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Page 2

This production of documents contains document families with responsive documents that are being redacted or withheld on the grounds of privilege or work product. We will provide a privilege log in accordance with the Court's instructions.

The ZHP Parties are also producing an overlay file with natively redacted Excel files through the Aquipt document repository in order to provide files that were not previously included in various prior production volumes. By agreement with Plaintiffs' counsel, the ZHP Parties previously produced slip sheets for these files but needed more time to redact and produce the native files.

The ZHP Parties are also producing an overlay file with replacement images and native files with downgraded confidentiality designations in the meta-data, on the images, and in the native file titles. These replacements relate to documents in various production volumes.

Sincerely,

/s/ Joseph S. Ferretti

Joseph S. Ferretti

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